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MAGPUL INDUSTRIES CORP.
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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO**

10
11 MAGPUL INDUSTRIES CORP.,

12 Plaintiff,

13 v.

14 FRANK ROBERT PEREZ, an individual; and
DOES 1-10,

15 Defendants.
16

Case No. 3:19-cv-05834-SI

**STIPULATION FOR ENTRY OF A
PERMANENT INJUNCTION;
[PROPOSED] ORDER**

Hon. Susan Illston

17 IT IS HEREBY stipulated and agreed by and between the Parties MAGPUL INDUSTRIES,
18 CORP. (“Magpul”) and defendant FRANK ROBERT PEREZ (“Perez”), to the filing of a consent
19 order for permanent injunctive relief in the form proposed below. The Parties have entered into
20 this Stipulation and are making this request in conjunction with their settlement of this action. By
21 their signatures, below, counsel for Magpul and Perez indicate that they have fully reviewed this
22 stipulation with their clients, that they have advised their clients regarding the effects of the
23 requested permanent injunction, and that the each Magpul and Perez have asked their attorneys to
24 sign this stipulation, indicating the individual party’s intention to be bound by the terms of the
25 requested permanent injunction.

26 **REQUESTED PERMANENT INJUNCTION**

27 Upon entry of an Order by the Court, Defendant FRANK ROBERT PEREZ will be forever
28 restrained from:

1 a. manufacturing, importing, advertising, promoting, marketing, offering to sell,
2 selling, distributing, or transferring any products bearing counterfeit Magpul trademarks;
3 b. using any other false designation of origin, false description or representation, or
4 any other use of Magpul's name or marks, logo or trade dress, or counterfeit versions thereof, in a
5 manner calculated to falsely advertise counterfeit products as being manufactured, distributed,
6 sponsored, authorized, or endorsed by Magpul, or otherwise associated with Magpul in any way;
7 c. secreting, concealing, destroying, selling off, transferring, returning, or otherwise
8 moving, storing, or disposing of any counterfeit Magpul product, other than by sending such
9 counterfeit product to Magpul.

10 THEREFORE IS IT STIPULATED AND AGREED that the Court should enter an Order
11 giving effect to the requested permanent injunction.

12 DATED: December 31, 2019

SIDEMAN & BANCROFT LLP

14 By: /s/ Louis P. Feuchtbaum

15 Louis P. Feuchtbaum
16 Attorneys for Plaintiff
MAGPUL INDUSTRIES CORP.

17 DATED: December 31, 2019

LO & LO, LLP

19 By: /s/ Kelvin J. Lo

20 Kelvin J. Lo
21 Attorneys for Defendant
FRANK ROBERT PEREZ

22 **ATTESTATION OF CONSENT OBTAINED FROM SIGNATORIES**

23 Pursuant to L.R. 5-1(i), I hereby attest that I obtained the concurrence of all signatories on
24 this document to file this document on their behalf with the Court. I declare under penalty of
25 perjury of the laws of the United States of America that the foregoing is true and correct.

26 DATED: December 31, 2019

27 By: /s/ Louis P. Feuchtbaum

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~~**[PROPOSED]**~~ ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.

DATED: ~~December~~ ^{January 2, 2020} ~~____~~, 2019



The Honorable Susan Illston
United States District Court Judge